

**POLICY FOR PRESERVATION & ARCHIVAL OF
DOCUMENTS OF SUMUKA AGRO INDUSTRIES
LIMITED**

I. Foreword

Regulation 9 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires every listed entity having listed its securities on recognised stock exchange(s) to formulate a policy for Preservation of Documents. The Company has, accordingly, adopted the following policy for Preservation of Documents.

Regulations 30(8) and 46 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 requires all listed companies to host all the disclosures of events and other information on its website for a minimum period of five years. Further, the Listing Regulations provide that after a period of five years the said disclosures be maintained as per the web archival policy of the concerned company.

II. Objective of the Policy

The objective of the Policy is to make a frame work for classification of documents which are required to be preserved permanently or at least for 8years and to ensure their availability for easy retrieval, when needed and to define principles and guidelines for ensuring protection, maintenance and archival of Sumuka Agro Industries Limited (formerly known as Superb Papers Limited) (“the Company”) disclosures, documents and records that are placed on its website

III. Time period for preserving the document

Time period for preserving the document shall be classified into two categories:

1. Documents required to be maintained permanently
2. Documents required to be maintained at least for 8 years

Following documents shall be maintained permanently

- a) Immovable property related documents
- b) Government approval letters, sanction letters, permissions from government authority, Court Orders, Legal Agreements, and any other Statutory and Legal documents.
- c) Register of Loans, Guarantee, security and acquisition made by the Company (Form MBP 2)
- d) Register of Investments (Form MBP 3)
- e) Register of Contracts (Form MBP 4)
- f) Register of Charge
- g) Register of Members with Index (including Foreign Register of Members)
- h) Annual Returns
- i) Minutes of General Meetings
- j) Minutes of Board and Committee Meetings
- k) Register of renewed and duplicate share certificates
- l) Memorandum and Articles of Association.
- m) Documents evidencing ownership of intellectual property rights
- n) Notice of meetings of shareholders and creditors including the agenda and explanatory statements and minutes thereto.
- o) Agenda List for the meetings of the Board of Directors.
- p) Certificate of incorporation of the Company, certificates of registration, licenses, permits, consents etc. under various statutory laws – e.g. Factories Act, GPCB etc.
- q) Any other document as may be required to maintain permanently in terms of applicable law(s), maintained and preserved from time to time.

Following documents shall be maintained for period of not less than eight years

- a) Books of Accounts, Purchases, Sales including vouchers
- b) Disclosure from Directors (Form MBP 1 and DIR-8)
- c) Dividend Register & paid instruments
- d) Register of Fixed Deposits
- e) Register of FD Interest & paid instruments
- f) Instruments creating a charge and modification
- g) Register of debenture-holders including an index of the names
- h) Foreign register of debenture-holders
- i) Registers of Members including index of the names
- j) Register of Foreign members
- k) Annual return and copies of all certificates and documents required to be annexed thereto.
- l) All books and documents relating to the issue of share certificates
- m) Returns, disclosures, filings, etc. with regulatory authorities under various enactments - e.g. periodical reports/returns to SEBI, Stock Exchange, authorities under the laws relating to income-tax, excise and customs, service tax, value added tax, sales tax, etc.
- n) Notes on agenda for meetings of the Board of Directors and its Committees.
- o) Films, Videos, CDs, DVDs, tapes, etc.
- p) Any other document as may be required to maintain in terms of applicable law(s), maintained and preserved from time to time.

IV. Mode of preservation of Document

The company shall preserve documents in electronic or physical form with proper security for accessing documents

V. Safe keeping of Documents

Documents required to be preserved shall be kept at a safe and secured places so that they are protected from destruction or decay. The Company shall maintain proper infrastructure for keeping records and documents in a secured and systematic manner for their safety and easy retrieval.

The Company shall maintain a Register of the Permanent Documents and Documents to be preserved for 8 years, with the Title or Brief Description and date of the document, place where preserved and name of the custodian of the document.

In cases where the original document is not available then a copy of such document if available shall be preserved permanently and a note shall be made in the Register of Documents.

Safe keeping of documents preserved physically:

1. Proper place and cupboard or racks which are fire and weather proof should to be used for storing of documents.
2. Care should be taken to prevent fire at the storage/record room.
3. Storage/Record rooms should be kept clean, so that pests, fungus, rats do not damage documents.
4. Good quality files should be used for filing of documents.
5. A register and Index of the documents stored should be maintained and updated from time to time.
6. Important documents should be kept secured in the custody of responsible person. The custodian shall maintain record of temporary removal and issue of Document against requisition and return of the document.

Safe keeping of document preserved electronically:

1. Computers, Servers and Laptops, hard discs, electronic storage media, where files are stored should be protected from virus and updated
2. Backups of the documents should be maintained and updated from time to time.
3. Important documents should be kept protected by password.

Disclosed Event/Information:

The events or information which have been disclosed by the Company to BSE Limited (hereinafter collectively referred to as “Stock Exchanges”) in accordance with the Listing Regulations and the Company’s Policy on Determination of Materiality of Events/Information shall be available on the Company’s website for a period of five years from the date of its hosting on the website. Upon expiry of a period of five years from the date of such disclosures being hosted on the website of the Company, the disclosed event or information will be archived as per this Policy.

Archival and Preservation of Disclosed Events/Information:

The disclosed events/information on the website of the Company will be reviewed on an ongoing basis. All disclosed events/information on the website of the Company would be moved to an archival folder after a period of 5 years from the date on which such events/information are put up on the website. The archived folder would be available for a period of five years.

After the expiry of five years, the archived disclosures/announcements will be removed from the website of the Company.

The Company may use the services of an external vendor with appropriate experience and infrastructure in this regard.

Amendment:

Any amendment in this Policy may be carried out with the approval of the Board of Directors of the Company.